

relevant portion of said Tax Map is attached as Exhibit 4 and incorporated herein.

16. That Plaintiffs' counsel, James R. Shoemaker, undertook, in conjunction with Sutcliffe & Associates, Inc., surveyors, a search of all of the available plats of the area which includes the subject Parcel B, and that said search indicated that the subject Parcel B was never a part of the said surrounding properties.

17. That as hereinabove explained, Plaintiffs' counsel have been unable to determine who may have owned the said Parcel B at the time(s) during which the Plaintiffs' predecessors in interest adversely possessed said Parcel B, but have determined that Parcel B was never part of the surrounding properties.

18. That after discussing this matter with Judge G. Edward Dwyer, Jr. of this Court, your Plaintiffs' counsel have decided to name as Defendants in this suit the present surrounding landholders, hereinabove named, and all other persons claiming an interest in the subject parcel B.

19. That in order to perfect title in themselves, the Plaintiffs bring this action.

20. That as shown on the Affidavits attached hereto as Exhibit 5 and incorporated herein, the Plaintiffs and their predecessors in interest have possessed the subject property for a period in excess of 20 years, and that such possession has been actual, open, notorious, visible, exclusive, hostile, and continuous.

21. That Defendants, Milton Ray Wolfe, Jr., Jane Alice Wolfe, Masten D. Long and Katherine M. Long, have consented to this Court issuing an order quieting title to the subject Parcel B in the Plaintiffs, as evidenced by the Consents attached hereto as Exhibit 6 and incorporated herein.